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UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA  
 SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,	)	NO. CR 25-00053 WHO
	)	
Plaintiff,	)	
	)	
v.	)	AMENDED STIPULATION RE INTERIM
	)	DISBURSEMENT OF FUNDS IN CLERK'S
NOAH ROSKIN-FRAZEE,	)	ACCOUNT AND ORDER
	)	
Defendant.	)	
	)	

The United States and defendant Noah Roskin-Frazee, by and through their respective counsel, hereby stipulate and agree as follows:

1. Pursuant to the plea agreement in the above-captioned matter and in the related case, No. 23-CR-00471 WHO, defendant Noah Roskin-Frazee agreed to deposit at least \$1 million in the registry of the Court within 60 days of the entry of his guilty pleas and at least another \$100,000 in the registry of the Court within 18 months of his guilty pleas. *See* Plea Agmt. ¶ 9. This money was to be deposited for the benefit of the defendant's restitution obligations. *Id.*
2. The defendant has since deposited over \$1,128,925.86 into the registry of the Court. *See* ECF Nos. 13, 19.

- 1       3. The Court has not yet made a final determination of the total restitution owed by the  
2       defendant, but the parties have agreed that it totals at least \$3,945,096.32. *See* Plea Agmt.  
3       ¶ 9.
- 4       4. The defendant is enrolled in one of the Court’s alternative justice programs; if the defendant  
5       successfully completes that program, the Court will likely not impose judgment for more  
6       than a year.
- 7       5. In light of this extended delay in the proceedings, the parties determined that it is appropriate  
8       for the Clerk to make an interim distribution of the funds in the Clerk’s registry to the victims  
9       and have agreed that the defendant should receive credit in this amount towards any  
10      restitution the Court eventually orders.
- 11     6. On October 17, 2024, prior to the guilty plea and sentencing in this case, the Court directed  
12      the Clerk to accept payment for the defendant’s criminal monetary penalties and “maintain  
13      such funds in the Clerk’s Registry, including interest earned thereon, pending any further  
14      order of the Court.” ECF No. 27.
- 15     7. On June 18, 2025, the Parties stipulated and requested that that the Court enter an order  
16      disbursing funds directing the Clerk to disburse the funds it maintains under the above-  
17      captioned case. The Court entered that order on June 20, 2025.

18       WHEREFORE, to clarify that the funds released for disbursement include interest accrued on the  
19      underlying principle, the parties respectfully request that the Court enter an order in the form proposed  
20      directing the Clerk to disburse the funds it maintains under the above-captioned case, inclusive of  
21      interest earned thereon, with three percent going to the victim identified in the Indictment as  
22      COMPANY A and 97 percent going to the victim identified in the Indictment as COMPANY B. This is  
23      without prejudice to the Court’s determination of whether or not to impose interest as part of any  
24      eventual judgment.

25       IT IS SO STIPULATED this 18th day of July, 2025.

1 CRAIG H. MISSAKIAN  
United States Attorney

CONRAD METLITZKY KANE LLP

2 /s/ Nikhil Bhagat

/s/ Elizabeth Ann Kim

3  
4 NIKHIL BHAGAT  
Assistant U.S. Attorney

ELIZABETH ANN KIM  
Counsel for Noah Roskin-Frazee

**ORDER**

Pursuant to the parties' stipulation, and for good cause shown,

IT IS HEREBY ORDERED that the Clerk of Court release all funds held in the Court Registry under case number 3:25-CR-00053 WHO, including both principal and any accrued interest;

IT IS FURTHER ORDERED that the Clerk of Court disburse approximately **97 percent** of those funds to the victim identified as COMPANY B in the Indictment in case number 3:23-CR-00471;

IT IS FURTHER ORDERED that the Clerk of Court disburse approximately **three percent** of those funds to the victim identified as COMPANY A in the Indictment in case number 3:23-CR-00471.

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: July 23, 2025

  
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HON. WILLIAM H. ORRICK  
Senior United States District Judge